



Pennsylvania Department of Environmental Protection

2 Public Square
Wilkes-Barre, PA 18711-0790
June 6, 1997

Northeast Regional Office

717-826-2516

Lisa M. Millington
Environmental Affairs Coordinator
B. Braun Medical Inc.
824 Twelfth Avenue
P. O. Box 4027
Bethlehem, PA 18018-0027

RE: Hazardous Waste Permit by Rule
Operation of a Captive Neutralization
Treatment Unit under 25 Pa. Code 265.433
B. Braun Medical Inc.
Northampton County

Lehigh

Dear Ms. Millington:

The Department is in receipt of your April 30, 1997 submittal requesting an approval to operate a captive wastewater treatment unit at your facility under the hazardous waste regulations, Title 25, Section 265.433. The Department conducted a facility site visit on April 17, 1997, reviewed your submitted material and has determined that this unit qualifies for permit by rule contingent on the following conditions:

1. B. Braun Medical Inc. shall comply with all pertinent regulations and Title 25, Section 265.433. Any changes in the hazardous waste regulations or changes in your manufacturing or treatment process would require a reevaluation.
2. The Department may require B. Braun Medical Inc. to apply for a permit if the facility does not comply with all pertinent conditions of 25 Pa. Code 265.433 or is conducting an activity that harms or presents a threat to harm human health or the environment.

If you have any questions regarding this matter, please contact me at the above address or telephone number.

Sincerely,

William Tomayko

William Tomayko
Program Manager
Waste Management Program





B. Braun Medical Inc.
824 Twelfth Avenue
PO Box 4027
Bethlehem, PA 18018-0027
Telephone: 610-691-5400
Telefax: 610-691-2202

April 30, 1997

Mr. Robert K. Lewis
Department of Environmental Protection (DEP)
Facility Section Supervisor, Northeast Regional Office
2 Public Square
Wilkes Barre, PA 18711-0790

Dear Mr. Lewis,

It has been brought to B. Braun's attention by the local DEP office, that B. Braun is required to apply for a Permit By Rule because of the neutralization process of Ethylene Glycol (25 PA CODE 265.433--Neutralization Treatment Units). A description of the neutralization process is herein, per your request. The neutralization waste is hazardous (40 CFR 261.10) because of the corrositivity of the mixture (20%-ethylene glycol, 80% water). Before neutralization, the mixture has a pH of .5-1.0. The ethylene glycol/water mixture is then treated with sodium hydroxide to establish and maintain a pH of 7. After neutralization, the ethylene glycol/water mixture is non-hazardous and taken off-site by American Chemical Exchange (ACE).

B. Braun steps undertaken in the compliance with 25 PA CODE 265.433--Neutralization Treatment Units: B. Braun Medical has a NPDES (National Pollutant Discharge Elimination System) permit with the Borough of Catasauqua (265.433 (2) and has an EPA ID number with the EPA (264.11). The neutralization unit is located within the building which requires card access to the building and card access to the area of the neutralization unit (264.14). A preventative maintenance program is maintained for the entire sterilization area and retained at the facility (264.15). All operating records are kept at the facility (264.73). B. Braun will file a biennial report by March 1, 1998, if as a large quantity generator B. Braun generates more than 2, 200 lbs. of hazardous waste in any one month of the reporting year (264.75). Additional reports are filed, if necessary (264.77). The criteria for Chapter 264, Subchapters C & D; and Chapter 265, Subchapter Q, have been complied with as stated in the regulation.

Attached please find a schematic of the neutralization process and a detailed description of the neutralization process and its purpose. I am looking forward to your response regarding acknowledgement of B. Braun's neutralization treatment process. If you have any question regarding this matter, please feel free to contact myself at (610) 691-5400 or Steve Stancick, Sterilization Manager, at (610) 266-0500.

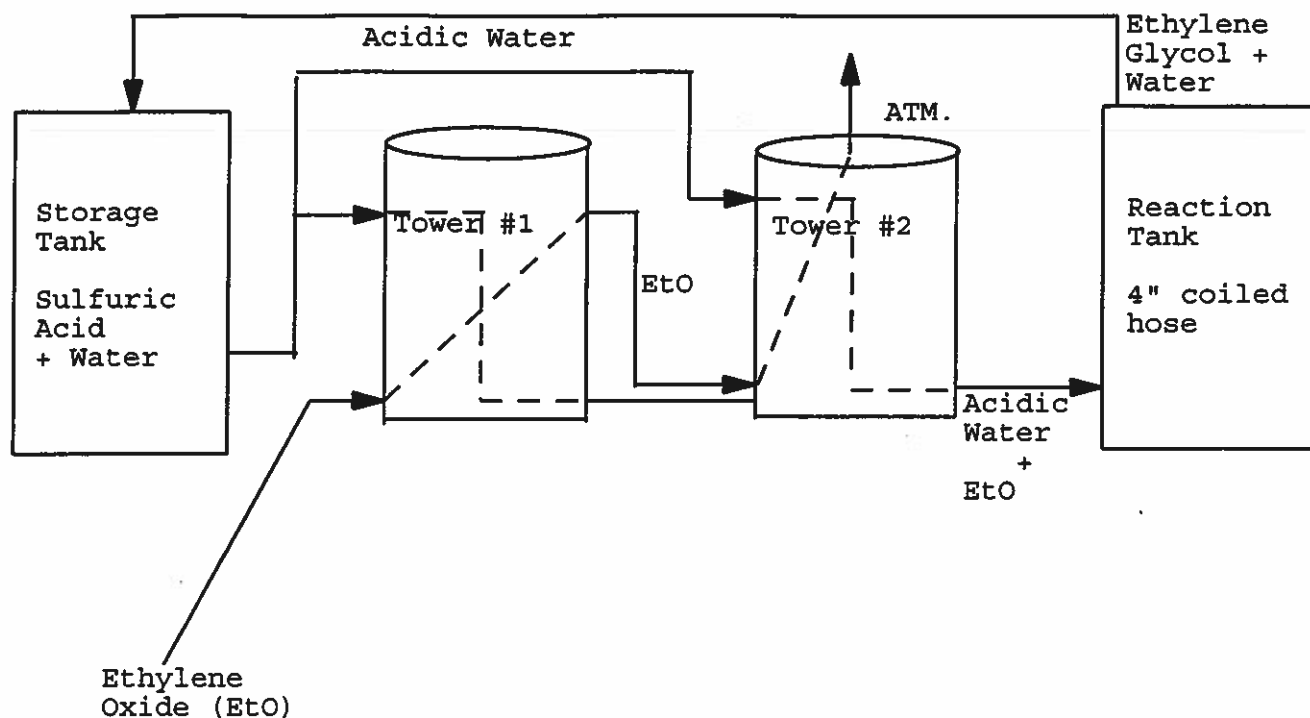
Sincerely,

Lisa M. Millington
Environmental Affairs Coordinator

cc: H. Morrison
Dr. L. Lucas
D. Calek

S. Stancick

DEOXX SCRUBBER SYSTEM



Ethylene Oxide Gas Stream enters bottom of Tower #1.
Acidic water enters top of Towers 1/2.
Entrapment occurs when Ethylene Oxide mixes with acidic water.
Added efficiency occurs thru Tower #2.
Final EtO/Acidic Water mixture goes to Reaction Tank.
Mixing of EtO/Acidic Water converts mixture to ethylene glycol + water.
Ethylene Glycol Mixture is recirculated back to the Storage tank.
Storage Tank Liquid is reused until tank is full or concentration reaches 50%.